

**STATE OF ILLINOIS**  
**BEFORE THE ILLINOIS COMMERCE COMMISSION**

\* \* \* \* \*

Sprint Communications L.P. d/b/a Sprint	)	
Communications Company L.P.	)	
	)	
Petition for Consolidated Arbitration with	)	Case No. 05-0402
Certain Illinois Incumbent Local Exchange	)	
Carriers pursuant to Section 252 of the	)	
<u>Telecommunications Act of 1996.</u>	)	
	)	
Sprint Communications L.P. d/b/a Sprint	)	
Communications Company L.P.	)	
	)	
Petition for Arbitration under the	)	Case No. 05-0443
Telecommunications Act to Establish Terms	)	(consolidated)
and Conditions for Interconnection with Viola	)	
Home Telephone Company.	)	

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**RESPONSE IN OPPOSITION TO MOTIONS TO DISMISS**

NOW COMES Sprint Communications L.P. d/b/a Sprint Communications Company L.P. (“Sprint”), by its attorneys, pursuant to Part 200.190 of the Commission’s Rules of Practice,<sup>1</sup> and hereby files this Response in Opposition to Respondents’ Motion to Dismiss and respectfully requests that the Illinois Commerce Commission (“Commission”) deny the Motions, in their entirety. In opposition to the Motion, Sprint states as follows:

On June 29, 2005, Sprint filed a Consolidated Petition for Arbitration with this Commission, seeking, pursuant to Section 252 of the Federal Telecommunications Act of 1996<sup>2</sup> (the “Act”), arbitration of Interconnection Agreements with the following ten Illinois rural incumbent local exchange carriers:

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<sup>1</sup> 83 Ill. Admin Code § 200.190.

<sup>2</sup> 47 U.S.C. § 252.

Cambridge Telephone Company  
C-R Telephone Company  
The El Paso Telephone Company  
Geneseo Telephone Company  
Harrisonville Telephone Company

Henry County Telephone Company  
Marseilles Telephone Company  
Metamora Telephone Company  
Mid Century Telephone Cooperative  
Reynolds Telephone Company

On July 8, 2005, Sprint filed a Petition for Arbitration with this Commission, seeking, pursuant to Section 252 of the Federal Telecommunications Act of 1996<sup>3</sup> (the “Act”), arbitration of Interconnection Agreements with the following Viola Home Telephone Company (Collectively all of the Respondent rural incumbent local exchange carriers are referred to herein as “RLECs”). On July 19, 2005, the Commission consolidated Sprint’s two Petitions for Arbitration.

On July 14, 2005, Harrisonville Telephone Company, Marseilles Telephone Company, and Metamora Telephone Company (collectively, along with Viola Home Telephone Company, “Movants”) filed a Motion to Dismiss the Petition for Arbitration. On the same date, Viola Home Telephone Company filed a Second Motion to Dismiss the Petition for Arbitration.<sup>4</sup>

This Commission has already ruled, in Docket No. 05-0259 *et al.*, “that because Sprint Communications, L.P. d/b/a Sprint Communications Company L.P. is a ‘telecommunications carrier,’ [the Movants] have an obligation to negotiate with Sprint Communications, L.P. d/b/a Sprint Communications Company L.P., or any similarly situated entity, under subsections (a) and (b) of Section 251 of the federal Telecommunications Act.”<sup>5</sup>

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<sup>3</sup> 47 U.S.C. § 252.

<sup>4</sup> Viola Home Telephone’s First Motion to Dismiss was denied by the Administrative Law Judge in an oral ruling on July 15, 2005. TR 67.

<sup>5</sup> ICC Docket Nos. 05-0259, July 13, 2005, Order, p. 15.

In the Motions to Dismiss, which are almost identical, the Movants allege that because, in their sole opinion, Sprint's services are entirely interstate in nature<sup>6</sup> the Federal Communications Commission ("FCC") order asserting federal jurisdiction over Voice Over Internet Protocol ("VoIP") telephone services "having the same capabilities as [Vonage Holding Corporation's] DigitalVoice"<sup>7</sup> applies and this Commission does not have jurisdiction over Sprint's Petitions for Arbitration. However this assumption fails when one examines the *Vonage Order*. The FCC clearly did not hold that the Vonage Service to be an interstate service. Rather the FCC found that while Vonage's "DigitalVoice clearly enables intrastate communications, it also enables interstate communications. It is therefore a jurisdictionally mixed service, and [the FCC] has exclusive jurisdiction under the Act to determine the policies and rules, if any, that govern the interstate aspect of DigitalVoice service."<sup>8</sup> Since the FCC did not make a ruling that Vonage's service is interstate, then the Applicants argument that Sprint and MCC's service is interstate is incorrect and the Vonage Order is inapplicable.

Furthermore, as Sprint has repeatedly noted, the Sprint and MCC service is very different from the services Vonage offers. The most notable difference is that ***plain and simple, Sprint is not proposing to offer an Internet service.*** Sprint is not offering a service that "provides a host of other features and capabilities that allow subscribers to manage their personal communications over the Internet,"<sup>9</sup> which is what Vonage is doing. What Sprint will be offering is basic local exchange telephone service. The mere fact that Sprint uses the Internet Protocol, "because it is

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<sup>6</sup> Motions, ¶2.

<sup>7</sup> *FCC Memorandum Opinion and Order, In the Matter of Vonage Holdings Corporation, Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, WC Docket No. 03-211, Adopted: November 9, 2004 Released: November 12, 2004, ¶46 ("Vonage Order").

<sup>8</sup> *Vonage Order*, ¶18.

the protocol supported by the cable industry for placing voice traffic onto a hybrid fiber coax network” does not render Sprint’s service an Internet service. In fact Sprint’s service does not utilize the Internet, the public network of interconnected computing systems utilizing the Transmission Control Protocol/Internet Protocol (“TCP/IP”),<sup>10</sup> which is the essential element that allows IP Telephony systems such as Vonage to operate.

A detailed understanding of the nature of the telephone calls and how those calls are delivered to the end-user are an essential part of comprehending the differences between the service Sprint will be offering and the service which the Movants allege Sprint is offering, which the FCC discussed in the *Vonage Order*. As explained in the prefiled verified Direct Testimony of James R. Burt,<sup>11</sup> Sprint will be offering voice telephone service, the facilities for which will be transparent to the end-user. In those instances where Sprint will be providing services in conjunction with cable companies, the discrete components that Sprint will be using to provide the “last mile” portion of the transmission facilities used by Sprint will be the cable provider’s cable connection to the home.

When an end-user places a telephone call using the Sprint/Cable solution, that end-user will pick up a standard telephone<sup>12</sup>—which the end-user may choose to purchase at Target, Wal-Mart, or any other retail store. The end-user will dial the telephone, just like an end-user customer of the Petitioners would. The telephone signal will transmit through the standard phone jack in the end-user’s home to a device called an embedded multimedia terminal adapter

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<sup>9</sup> *Vonage Order*, ¶4.

<sup>10</sup> For a more detailed description of the Internet and its origins, see, Haran C. Rashes, *The Impact of Telecommunications Competition and the Telecommunications Act of 1996 on Internet Service Providers*, 16 TEMP. ENVTL. L. & TECH. J. 49 (1997).

<sup>11</sup> Filed on July 14, 2005 in Docket 05-0402.

(“EMTA”). The EMTA provides an interface allowing broadband Internet service and cable television to be combined with the telephone service for transmission to the Cable company’s Cable Distribution Headend.<sup>13</sup> At the Headend, these services are again split out and the voice telephone service is sent to Sprint for switching to the proper destination telephone number or carrier. The telephone service being provided is a “basic service” of telephone-to-telephone voice service. This basic service will be transparently transmitted over Sprint’s network and, as appropriate, transparently transmitted over interconnected telephone company networks, such as those of the Petitioners. The service Sprint will be providing “is no different than the telephone service customers in RLEC territory have today”<sup>14</sup> and “are in no way associated with Internet access”<sup>15</sup> service.

There are several important and distinct differences between the service offered as part of the Sprint/MCC offering and Vonage’s DigitalVoice service that legally distinguish it from the service addressed by the FCC in the *Vonage Order*.

- Vonage service requires “access to a broadband connection to the Internet to use the service”<sup>16</sup> | The customers of the voice service provided by Sprint and MCC do not need, and are not required, to have connectivity to the Internet.

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<sup>12</sup> The FCC refers to a standard telephone as Customer Premises Equipment (“CPE”) throughout its various orders, some of which are cited below.

<sup>13</sup> There may be instances (depending on the type of EMTA selected) where the cable television service is split off prior to the EMTA. However, whether the cable television service is split off prior to the EMTA or at the EMTA, the three services being offered, telephone service, cable television service, and broadband internet service all remain distinct and separate services operating over the same facility.

<sup>14</sup> Burt Testimony, ln. 182-183.

<sup>15</sup> Burt Testimony, ln. 181.

<sup>16</sup> *Vonage Order*, ¶5.

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|--|--|
| <ul style="list-style-type: none"> <li>• Vonage’s service is fully portable; customers may use the service anywhere in the world where they can find a broadband connection to the Internet.<sup>17</sup></li> </ul>   | <p>“The voice service provided by Sprint and MCC is not nomadic, the subscribers only use the service in their home.”<sup>18</sup></p>   |
| <ul style="list-style-type: none"> <li>• Although [Vonage’s] customers may in some cases attach conventional telephones to the specialized CPE that transmits and receives these IP packets, a conventional telephone alone will not work with Vonage’s service.<sup>19</sup></li> </ul> | <p>The customers of the voice service provided by Sprint and MCC will, in many cases, be able to use their own telephones and their own home’s wiring utilizing an eMTA interface that will allow MCC’s coaxial cable to be utilized as the “last mile”.</p> |
| <ul style="list-style-type: none"> <li>• Vonage’s “outgoing calls originate on the Internet and are routed over the Internet to Vonage’s servers.” and incoming calls are routed “to the Vonage user over the Internet.”<sup>20</sup></li> </ul>   | <p>The voice service provided by Sprint and MCC does not use or transit the public Internet.<sup>21</sup></p>  |
| <ul style="list-style-type: none"> <li>• “A call to a Vonage customer’s NANP number can reach that customer anywhere in the world and does not require the user to remain at a single location.”<sup>22</sup></li> </ul>   | <p>Because “the voice service provided by Sprint and MCC is not nomadic, [and] the subscribers only use the service in their home,”<sup>23</sup> the NANP numbers assigned to Sprint will be used at the customers’ home premises only.</p>                  |

The FCC recognized that not all voice telephone services that utilize the Internet Protocol would mirror the basic characteristics of Vonage’s DigialVoice service and noted that it would only preempt state regulation to the extent that other services have these same basic characteristics.

Specifically, these basic characteristics include: a requirement for a broadband connection from the user’s location; a need for IP-compatible CPE; and a service offering that includes a suite of integrated capabilities and features, able to be invoked sequentially

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<sup>17</sup> *Vonage Order*, ¶5.

<sup>18</sup> Burt Testimony, ln. 218-219.

<sup>19</sup> *Vonage Order*, ¶7.

<sup>20</sup> *Vonage Order*, ¶8.

<sup>21</sup> Burt Testimony, ln. 214-215 and 287-298.

<sup>22</sup> *Vonage Order*, ¶9.

<sup>23</sup> Verified Testimony of James R. Burt, filed in Docket No. 05-0402, ln. 218-219.

or simultaneously, that allows customers to manage personal communications dynamically, including enabling them to originate and receive voice communications and access other features and capabilities, even video.<sup>24</sup>

**The Sprint and MCC offering does not have the majority of these characteristic, and as such the FCC’s preemption should not apply.** Further, since the FCC did not exercise jurisdiction over Section 251 interconnection services in the *Vonage Order*, jurisdiction unless and until the FCC finds otherwise, remains with this Commission<sup>25</sup> and the Applications should be denied.

The Movants also argue that the United States Supreme Court gave the FCC jurisdiction over Sprint’s proposed service in *Nat’l Cable & Telecomms Ass’n v. Brand X Internet Servs.*<sup>26</sup> In *Brand X*, the Supreme Court reversed the 9<sup>th</sup> Circuit Court of Appeals and upheld the Federal Communications Commission’s determination that broadband Internet service provided by cable companies, also known as cable modem service, is solely an “information service” and not a “telecommunications service.” However, the Movants were incorrect in characterizing Sprint as an “IP provider.”<sup>27</sup> **Plain and simple, Sprint is NOT proposing to offer an Internet service.** What Sprint will be offering is telephone service.

*Brand X* makes the distinction between IP services, such as cable modem or broadband service, and telephone service very clear.

[A] telephone company “offers” consumers a transparent transmission path that conveys an ordinary-language message, not necessarily the data transmission facilities that also “transmi[t] . . .

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<sup>24</sup> *Vonage Order*, ¶32.

<sup>25</sup> The FCC specifically declined to rule in the *Vonage Order* on the jurisdiction over “other critical issues such as universal service, intercarrier compensation, section 251 rights and obligations, numbering, disability access, and consumer protection.” *Vonage Order*, ¶44.

<sup>26</sup> \_\_\_ U.S. \_\_\_; 125 S. Ct. 2688; 162 L. Ed. 2d 820 (2005) (hereinafter, “*Brand X*”)

<sup>27</sup> Motion, ¶10.

information of the user's choosing," §153(43), or other physical elements of the facilities used to provide telephone service, like the trunks and switches, or the copper in the wires. What cable companies providing cable modem service and telephone companies providing telephone service "offer" is Internet service and telephone service respectively—the finished services, though they do so using (or "via") the discrete components composing the end product, including data transmission.<sup>28</sup>

As explained above and in Mr. Burt's testimony, Sprint will be offering voice telephone service, the facilities for which will be transparent to the end-user. In those instances where Sprint will be providing services in conjunction with cable companies, the discrete components that Sprint will be using to provide the "last mile" portion of the transmission facilities used by Sprint will be the cable provider's cable connection to the home.

The telephone service Sprint will be providing is a "basic service" of telephone-to-telephone voice service. This basic service will be transparently transmitted over Sprint's network and, as appropriate, transparently transmitted over interconnected telephone company networks, such as those of the Petitioners. The Court recognized the FCC's finding that this type of transmission was "pure" or "transparent" to the end-user.

In particular, the [FCC] defined "basic service" as "a pure transmission capability over a communications path that is virtually transparent in terms of its interaction with customer supplied information." By "pure" or "transparent" transmission, the [FCC] meant a communications path that enabled the consumer to transmit an ordinary-language message to another point, with no computer processing or storage of the information, other than the processing or storage needed to convert the message into electronic form and then back into ordinary language for purposes of transmitting it over the network—such as via a telephone or a facsimile. Basic service was subject to common-carrier regulation.<sup>29</sup>

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<sup>28</sup> *Brand X*, \_\_\_ U.S. at \_\_\_; 125 S. Ct. at 2705; 162 L. Ed. 2d at 844.

<sup>29</sup> *Brand X*, \_\_\_ U.S. at \_\_\_; 125 S. Ct. at 2697; 162 L. Ed. 2d at 835. (citations omitted).

By contrast, Internet service is not, in the Court’s opinion, pure and transparent to the end-user, because the consumer is offered “the ability to translate raw Internet data into information they may both view on their personal computers and transmit to other computers connected to the Internet.”<sup>30</sup> This “offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications,”<sup>31</sup> distinguishes broadband Internet service from the telephone service to be offered by Sprint. “In other words, the [FCC] reasoned that consumers use their cable modems not to transmit information ‘transparently,’ such as by using a telephone, but instead to obtain Internet access.”<sup>32</sup>

Notwithstanding the Movants’ implication to the contrary, the telephone services Sprint proposes to offer are not the same services addressed in *Brand X*. In the case of Sprint’s telephone service, the end-user’s calls never travel over the Internet, the end-user does not need to have a computer to use the service, the end-user does not need to subscribe to or be a subscriber of “cable modem service” and the service is not mobile. Rather, Sprint plans to utilize the *technology* of VoIP to transmit signals from the end-user’s premises to the connection point. Internet Protocol is simply a set of rules that govern the communication between devices. This protocol, however, is not limited to devices connected to or used to access the Public Internet. In summary, Sprint will provide plain old telephone service to end-users using VoIP technology; it will not however provide access to the Public Internet, nor is Sprint’s voice service dependent upon the Public Internet. In fact, the cable company marketing Sprint’s service will be offering

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<sup>30</sup> *Brand X*, \_\_\_ U.S. at \_\_\_; 125 S. Ct. at 2696; 162 L. Ed. 2d at 834.

<sup>31</sup> *Brand X*, \_\_\_ U.S. at \_\_\_; 125 S. Ct. at 2697; 162 L. Ed. 2d at 835, at 5; *see also*, 47 U.S.C. § 153(20).

<sup>32</sup> *Brand X*, \_\_\_ U.S. at \_\_\_; 125 S. Ct. at 2698; 162 L. Ed. 2d at 836.

stand-alone voice services, separate and independently from an end-user's choice whether or not to purchase cable modem service to access the Internet.<sup>33</sup>

WHEREFORE, for the above stated reasons, Sprint Communications L.P. d/b/a Sprint Communications Company L.P. respectfully requests that this Commission deny the Motions to Dismiss.

Respectfully submitted,

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Dated: August 19, 2005

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<sup>33</sup> See, MCC Telephony of Illinois, Inc., IL.C.C. Tariff No. 1, Section 4.3.1.

**STATE OF ILLINOIS**  
**BEFORE THE ILLINOIS COMMERCE COMMISSION**

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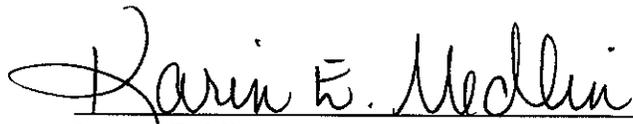
Sprint Communications L.P. d/b/a Sprint Communications Company L.P.	) ) )	
Petition for Consolidated Arbitration with Certain Illinois Incumbent Local Exchange Carriers pursuant to Section 252 of the <u>Telecommunications Act of 1996.</u>	) ) ) ) ) ) )	Case No. 05-0402
Sprint Communications L.P. d/b/a Sprint Communications Company L.P.	) ) )	
Petition for Arbitration under the Telecommunications Act to Establish Terms and Conditions for Interconnection with Viola Home Telephone Company.	) ) ) ) ) )	Case No. 05-0443 (consolidated)

**VERIFICATION**

James R. Burt, being duly sworn upon oath, deposes and states that he is employed by Sprint as Director – Regulatory Policy and in that capacity has read Sprint Communications L.P. d/b/a Sprint Communications Company L.P.’s August 19, 2005 Response in Opposition to Motions to Dismiss, in the above-captioned docket and knows the contents thereof, and that the same is true to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
**James R. Burt**

SUBSCRIBED AND SWORN TO BEFORE ME this 19<sup>th</sup> day of August, 2005.

  
\_\_\_\_\_  
Notary Public

My Commission expires: May 10, 2009

**Karin E. Medlin**  
**NOTARY PUBLIC - STATE OF KANSAS**  
**JOHNSON COUNTY**  
**MY COMMISSION EXPIRES 5-10-09**

**STATE OF ILLINOIS**

**BEFORE THE ILLINOIS COMMERCE COMMISSION**

Sprint Communications L.P. d/b/a Sprint )  
Communications Company L.P. )  
)  
Petition for Consolidated Arbitration with )  
Certain Illinois Incumbent Local Exchange )  
Carriers pursuant to Section 252 of the )  
Telecommunications Act of 1996. )  
)  
Plaintiff, )

Case No. 05-0402

**NOTICE OF FILING**

To: Parties of Record

You are hereby notified that on August 19, 2005, I filed, via the electronic e-docket system, with the Chief Clerk of the Illinois Commerce Commission, a Response in Opposition to Motions to Dismiss, on behalf of Sprint Communications L.P. d/b/a Sprint Communications Company L.P., in the above-captioned docket.

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Response in Opposition to Motion to Dismiss, in the above-captioned proceeding, were served upon the parties on the attached service list via Electronic Mail on August 19, 2005.

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Petition of Sprint Communications L.P. d/b/a Sprint Communications Company L.P.'s for  
Consolidated Arbitration with Certain Illinois Incumbent Local Exchange Carriers

Docket Nos. 05-0402 and 05-0433

Service List

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Petition of Sprint Communications L.P. d/b/a Sprint Communications Company L.P.'s for  
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Petition of Sprint Communications L.P. d/b/a Sprint Communications Company L.P.'s for  
Consolidated Arbitration with Certain Illinois Incumbent Local Exchange Carriers

Docket Nos. 05-0402 and 05-0433

Service List

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